State of North Carolina Department of Environment, Health and Natural Resources

James B. Hunt, Jr., Governor Jonathan B. Howes, Secretary



February 15, 1994

Mr. Evander Rowell, P.E. Fieldcrest Cannon, Inc. 1 Lake Drive Kannapolis, NC 28081

Reference: Proposed structural fill with coal combustion byproducts at Fieldcrest Plant # One, Kannapolis, N.C.

Dear Mr. Rowell:

We are in receipt of your reference (June 7, 1993) proposal as prepared by ENSCI Environmental, Inc. This submittal also includes revisions dated October 6, 1993 and February 4, 1994. These satisfy the requirements for coal ash structural fill activities as set forth in Solid Waste Management Rules 15A NCAC 13B Section .1700 - Requirements for Beneficial use of Coal Combustion By-Products.

Analyses of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site indicate that the ash may have caused or contributed to violation of the 15A N.C. Administrative Code 2L Standards for arsenic, cadmium, chromium, lead, selenium and silver, as well as elevated sulfate levels. Based upon this information, the Solid Waste Division strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration. You can then consider installation of groundwater monitoring wells depending on vulnerability before commencing fill operations.

If you have any question, please contact Bill Hocutt at (919) 733-0692 or Jan McHargue at (910) 896-7007.

Sincerely,

ames (

James C. Coffey, Supervisor

Solid Waste Section Permitting Branch

WRH/jsp

cc: Sherry B. MacQueen
Jan McHarque

Bill Hocutt